

TREPIC Networks LLC Gilbert, AZ 623-349-4172 admin@trepicnetworks.com

Marlene H. Dortch, Secretary Federal Communications Commission RE: GN Docket No. 12-354, RM-11778 and RM-11789

The purpose of this letter is to formally **oppose** the CTIA and T-Mobile petitions put forth in the above stated docket.

TREPIC Networks LLC is a rural, fixed-wireless Internet service provider, serving rural customers in central Arizona. Started in 2014, TREPIC Networks LLC now serves nearly 500 customers throughout the eastern Phoenix valley. We provide the following download speed packages to nearly all customers:

15 Mbps 25 Mbps

Upload speeds are 12 Mbps for all plans except those based on LTE, in which case the upload speeds are 2 Mbps.

Our company has been investing in the 3650-3700 Mhz band for many years. We continue to deploy equipment in this band, anticipating the final adoption of the fair rules adopted in 2015 establishing the current proposed use of the 3550-3700 MHz band. We have been an early adopter of the 3650-3700 MHz band for use with LTE deployments, which has increased our reach to previously unserved and underserved consumers. The momentum already underway for the proposed 2015 rules for the 3550-3700 band is meaningful to us as we have deployed equipment that is capable of abiding by all the CBRS band rules as anticipated today. This 100 MHz of new spectrum should not be restructured to be merely for the benefit of the "big 3" cellular carriers, when it is rural WISPs which have brought affordable, high quality, high speed Internet to rural consumers. Rural WISPs invest local money, in local communities, to provide a service to local consumers they cannot obtain from any large wireless carrier. Only by using the CBRS band as proposed in the 2015 rules will the rural consumer win and continue to enjoy affordable access to truly affordable, high-speed Internet.

Again, TREPIC Networks LLC is opposed to the CTIA and T-Mobile petitions to modify the structure of the CBRS band in a way that is clearly only beneficial to large carriers and not the end-customer.

Shane T. Miller, Partner

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